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MARY E. DIANDREA, CLERK.
Per Deputy Clerk

Dated: June 25, 2002

EXHIBIT A

Affidavit of Joanna N. Reynolds

COMMONWEALTH OF PENNSYLVANIA :
 : ss.
COUNTY OF DAUPHIN :

AFFIDAVIT OF JOANNA N. REYNOLDS

I, JOANNA N. REYNOLDS, swear and affirm the following:

1. I am currently an Assistant Counsel with the Pennsylvania State Police and co-counsel in the case of Ober v. Evanko, No. 1:CV-01-0084 (M.D., PA).

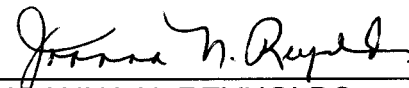
2. Mr. Don Bailey, counsel for the plaintiff, never advised me that Mr. Anthony Marceca or Mr. Albert Rodriguez were still in the process of acquiring their notary commissions prior to any depositions taken in this case. I never acquiesced in proceeding forward with any deposition knowing that Mr. Marceca and Mr. Rodriguez had not yet obtained their notary commissions. In fact, I did not learn that Mr. Marceca and Mr. Rodriguez had administered oaths prior to the effective dates of their commissions until May 2002, after discovery had already closed.

3. Anthony Marceca administered the oath at the depositions of retired Major Thomas Williams and Trooper Thomas Carr, which were taken by plaintiff's counsel on October 12, 2001. I was not present at either deposition; the defendants were represented that day by Syndi Guido, Deputy General Counsel of the Commonwealth. In May 2002, I first learned that Mr. Marceca's notary commission had not taken effect until October 24, 2001.

4. Mr. Rodriguez administered the oath at the depositions of Mary Bungo and William McAreavy, which were taken on April 10, 2002. I was present at those depositions, which were taken at the State Police Technology Center. Neither Adrienne Bailey nor Anthony Marceca were present at the Technology Center that day.

5. Mr. Rodriguez also administered the oath to Lieutenant Colonel Thomas Coury on the second day of his deposition, April 15, 2002. I was present at that deposition, which was taken at the State Police Technology Center. Neither Adrienne Bailey nor Anthony Marceca were present at the Technology Center that day.

6. In May 2002, I first learned that Mr. Rodriguez's notary commission did not take effect until May 10, 2002.



JOANNA N. REYNOLDS
Assistant Counsel
Pennsylvania State Police

Sworn to and subscribed

before me this 25th day

of June, 2002



Notary Public

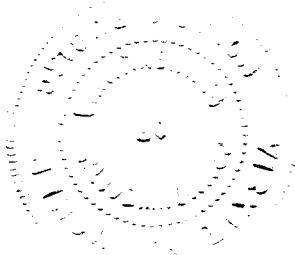
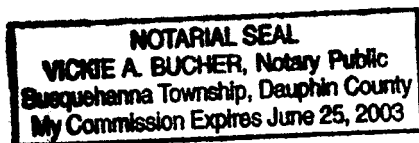


EXHIBIT B

Affidavit of Syndi L. Guido

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF DAUPHIN :

AFFIDAVIT OF SYNDI L. GUIDO

I, Syndi L. Guido, swear and affirm the following:

1. I am currently Deputy General Counsel for the Commonwealth of Pennsylvania and am the defendants' lead counsel in the case of *Ober v. Evanko*, No. 1:CV-01-0084 (M.D. PA).
2. Plaintiff's attorney, Don Bailey, never told me that Anthony Marceca or Albert Rodriguez were still in the process of acquiring their notary commissions prior to any deposition taken in this case.
3. I never acquiesced in proceeding forward with any deposition knowing that Mr. Marceca and Mr. Rodriguez had not yet obtained their notary commissions. In fact, I did not learn that Mr. Marceca and Mr. Rodriguez had administered oaths prior to the effective dates of their commissions until May 2002, after discovery had already closed.
4. The Governor's former Chief of Staff, Mark Campbell, was the first person deposed in the case. That deposition took place on October 10, 2001, at the State Capitol

building in Harrisburg, Pennsylvania. Mr. Marceca videotaped the deposition, but the oath was administered by a court reporter from Sargeant's Court Reporting Service. There was no discussion with Mr. Bailey about Mr. Marceca's status as a Notary Public. Adrienne Bailey was not present at the Capitol that day.

5. Anthony Marceca administered the oaths at plaintiff's next two depositions, which were taken on October 12, 2001, at Mr. Bailey's law office. The witnesses were Trooper Thomas Carr and retired Major Thomas Williams. I attended both depositions; Joanna Reynolds was not present at either one.

6. Trooper Thomas Carr was the first witness deposed on October 12, 2001. When I arrived at Mr. Bailey's law office, Trooper Carr was already present and seated in the witness chair. Mr. Bailey, Mr. Ober, and Mr. Marceca were in the room with Trooper Carr. At no time before, during, or after Trooper Carr's testimony did Mr. Bailey, or anyone else, advise me that Mr. Marceca was not yet a commissioned notary.

7. While I was at Mr. Bailey's office, Mrs. Bailey stayed at the reception desk with her infant, who was crying and not feeling well. During Trooper Carr's deposition, Mrs. Bailey had to take the child home.

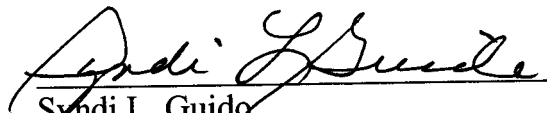
8. After Trooper Carr left Mr. Bailey's office, I waited with Mr. Bailey and Mr. Ober for Major Williams. When the Major arrived, his deposition began. Mrs. Bailey did not return to the office during the interim. At no time before, during, or after Major Williams' testimony did Mr. Bailey, or anyone else, advise me that Mr. Marceca was still in the process of obtaining his notary commission.

9. It was not until May 2002, that I first learned Mr. Marceca's notary commission had not taken effect until October 24, 2001.

10. I was not present at the depositions of Mary Bungo or William McAreavy, which were taken on April 10, 2002. I did not know that Albert Rodriquez had administered the witness's oaths until I subsequently obtained transcripts of those depositions.

11. I was not present at the second day of Lieutenant Colonel Thomas Coury's deposition on April 15, 2001. Until I obtained a transcript of the deposition, I did not know that Mr. Rodriquez had administered the oath to Lieutenant Colonel Coury.

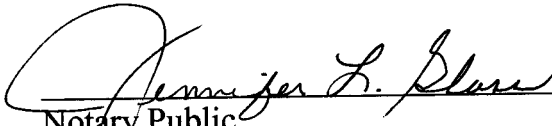
12. It was not until May 2002, that I first learned Mr. Rodriquez's notary commission did not take effect until May 10, 2002.


Syndi L. Guido
Deputy General Counsel
Commonwealth of Pennsylvania

Sworn to and subscribed

before me this 25th day

of June, 2002


Notary Public

Notarial Seal
Jennifer L. Glass, Notary Public
Harrisburg, Dauphin County
My Commission Expires Mar. 6, 2004

EXHIBIT C

Affidavit of Thomas Carr

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF DAUPHIN :

AFFIDAVIT OF THOMAS G. CARR


I, Thomas G. Carr, swear and affirm the following:

1. I am currently a trooper with the Pennsylvania State Police.
2. On October 12, 2001, I was deposed by plaintiff's counsel in the case of *Ober v. Evanko*, No. 1:CV-01-0084 (M.D., PA).
3. At my deposition, I was represented by Syndi L. Guido, Deputy General Counsel of the Commonwealth.
4. My deposition was held at Mr. Bailey's law office. I arrived at Mr. Bailey's office before Ms. Guido.
5. When Ms. Guido arrived for the deposition, I was already seated in the witness chair in the same room as Mr. Bailey and Captain Darrell Ober.
6. After Ms. Guido entered the room and was seated, I recall a preamble being given, stating the date and time of the deposition.

7. I do not remember everything that was said at my deposition. However, I have no recollection of Mr. Bailey mentioning to Ms. Guido, or anyone else in the room, that the individual who operated the video camera and administered the oath to me, was still in the process of obtaining his notary commission.

8. Joanna Reynolds, Assistant Counsel to the State Police, was not present at my deposition on October 12, 2001.

9. I do not recall Mrs. Bailey ever standing in the doorway. I recall Mrs. Bailey sitting behind the desk in the reception area. She was taking care of a child who was crying.

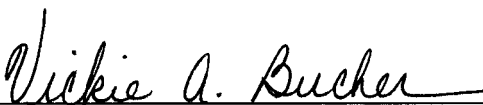


Thomas G. Carr

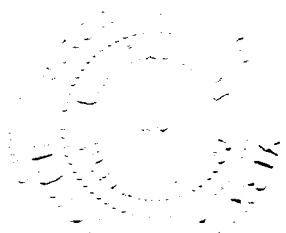
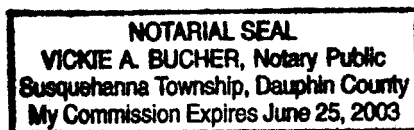
Sworn to and subscribed

before me this 25th day

of June, 2002



Notary Public



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

DARRELL G. OBER,

Plaintiff

vs.

PAUL EVANKO, MARK CAMPBELL,
THOMAS COURY, JOSEPH WESTCOTT,
HAWTHORNE CONLEY,

Defendants

NO. 1:CV-01-0084
(Judge Caldwell)

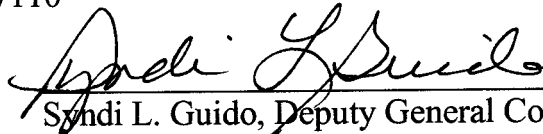
CIVIL ACTION - LAW

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of Exhibits to Defendants' Reply Brief in Support of their Motion for Summary Judgment was served on plaintiff's counsel, by first-class mail, addressed as follows:

Don Bailey, Esquire
4311 North 6th Street
Harrisburg, PA 17110


Syndi L. Guido, Deputy General Counsel
Governor's Office of General Counsel
333 Market Street, 17th Floor
Harrisburg, PA 17101
(717) 787-9356

Dated: June 25, 2002